

Application No.: 10/624,901

REMARKS

The Abstract is objected to for being too long. Pursuant to the Examiner's suggestion, the reference numerals have been deleted. Accordingly, it is respectfully requested that this objection be withdrawn.

Claims 4, 5, 8 and 9 are objected to for minor informalities. It is respectfully submitted that the enclosed amendment obviates the alleged informalities. Accordingly, it is respectfully requested that these objections be withdrawn.

Claims 1-16 stand rejected under 35 U.S.C. § 102 as being anticipated by Morrin. This rejection is respectfully traversed for the following reasons.

Claim 1 recites in pertinent part, "a save unit operable to perform a data saving, which is to save the data retained in the register to the *stack* memory, wherein when the judgment by the compression judgment unit is affirmative and the data saving is performed *in response to the call of the predetermined function*, the save unit compresses the data *before* the data saving, when the judgment by the compression judgment unit is affirmative and the data saving is performed *in response to call of a function that is other than the predetermined function*, the save unit performs the data saving *without compressing the data*, and when the judgment by the compression judgment unit is not affirmative, the save unit performs the data saving without compressing the data, whether the data saving is performed in response to the call of the predetermined function, or in response to the call of the function that is other than the predetermined function" (*emphasis added*).

Application No.: 10/624,901

According to one aspect of the present invention, it can be made possible to reduce the volume of data to be saved to the stack memory by compression in accordance with the information indicating that the data should be compressed. In this regard, even if the information indicates the data should be compressed, the data to be saved does not get compressed when the function called is not the predetermined function. Accordingly, with regard to data saved to the memory in response to the call of a function other than the predetermined function, *the present invention can also deal with data usage when the data is used via direct access to the stack memory.* Only Applicants have recognized and considered this effect, and conceived of the novel configuration which can realize said effect.

It is respectfully submitted that Morrin does not disclose or suggest the claimed combination recited in claim 1, as amended. Indeed, the disclosure of Morrin is directed to a general memory for storing an image, and is unrelated to memory used in association with operations for calling/returning a function. Specifically, Morrin judges whether the data-to-be-stored should be compressed or not on a single query; i.e., whether it is data of the image border (*see, e.g.*, col. 8, lines 52-55). According to the device of Morrin, data of the object border can not be stored in memory without first being compressed so that use of such data will always require decompression.

On the other hand, the present invention can utilize a two-prong query for judging whether the data should be compressed. For example, a compression judgment unit is operable to judge whether there is information indicating that the data should be compressed and then saved to a stack memory in response to call of a predetermined function. Moreover, a save unit can be configured whereby, in addition to the judgment of the compression judgment unit, the data saving protocol (i.e., whether to compress the data or not) can be determined based on the

Application No.: 10/624,901

call of functions (predetermined or not). Accordingly, the present invention can judge to compress the data or not based on which function is called, in response to which data saving (compressed or not compressed) can be performed by the save unit.

In sum, according to the present invention, even if information indicates the data should be compressed, the data to be saved may not get compressed *depending on the function called*. The device of Morrin has no such query and will compress the data based only on whether it is data of the border, with no secondary judgment much less in relation to called functions.

As anticipation under 35 U.S.C. § 102 requires that each and every element of the claim be disclosed, either expressly or inherently (noting that "inherency may not be established by probabilities or possibilities", *Scaltech Inc. v. Retec/Tetra*, 178 F.3d 1378 (Fed. Cir. 1999)), in a single prior art reference, *Akzo N.V. v. U.S. Int'l Trade Commission*, 808 F.2d 1471 (Fed. Cir. 1986), based on the forgoing, it is submitted that Morrin does not anticipate the independent claims, nor any claim dependent thereon. In this regard, it is respectfully submitted that Morrin does not anticipate claims 10 and 11 for reasons similar to those discussed above regarding claim 1.

Under Federal Circuit guidelines, a dependent claim is nonobvious if the independent claim upon which it depends is allowable because all the limitations of the independent claim are contained in the dependent claims, *Hartness International Inc. v. Simplimatic Engineering Co.*, 819 F.2d at 1100, 1108 (Fed. Cir. 1987). Accordingly, as the independent claims are patentable for the reasons set forth above, it is respectfully submitted that all claims dependent thereon are also patentable. In addition, it is respectfully submitted that the dependent claims are patentable based on their own merits by adding novel and non-obvious features to the combination.

**RECEIVED
CENTRAL FAX CENTER**

Application No.: 10/624,901

SEP 25 2007

Based on the foregoing, it is respectfully submitted that all pending claims are patentable over the cited prior art. Accordingly, it is respectfully requested that the rejections under 35 U.S.C. § 102/103 be withdrawn.

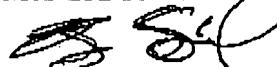
CONCLUSION

Having fully responded to all matters raised in the Office Action, Applicants submit that all claims are in condition for allowance, an indication for which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

McDERMOTT WILL & EMERY LLP



Ramyar M. Farid
Registration No. 46,692

600 13th Street, N.W.
Washington, DC 20005-3096
Phone: 202.756.8000 RMF:MaM
Facsimile: 202.756.8087
Date: September 25, 2007

Please recognize our Customer No. 53080
as our correspondence address.